

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

JASON J. CANJAR, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BAYER CROPSCIENCE LP, et al.

Defendants.

Case No. 3:21-cv-00181-NJR

**DEFENDANT UNIVAR SOLUTIONS INC.'S
MOTION TO DISMISS PLAINTIFFS' AMENDED
CLASS ACTION CONSOLIDATED COMPLAINT**

Defendant Univar Solutions Inc. (“Defendant Univar”) hereby moves to dismiss the Amended Class Action Consolidated Complaint (the “Complaint”) filed by Plaintiffs pursuant to Federal Rule of Civil Procedure 12(b)(6), based upon the Memorandum in Support filed herewith and incorporated herein, along with the pleadings and other papers previously filed in this action, including Defendants’ Joint Motion to Dismiss.

WHEREFORE, for the reasons stated and incorporated in Defendant Univar’s Memorandum in Support, Defendant Univar respectfully requests that the Court grant this Motion and dismiss all of Plaintiffs’ claims against Defendant Univar with prejudice.

Dated: May 5, 2021

Respectfully submitted,

By: /s/ Craig C. Martin

Craig C. Martin

Matt D. Basil

WILLKIE FARR & GALLAGHER LLP

300 North LaSalle

Chicago, IL 60654-3406

Telephone: (312) 728-9000

cmartin@willkie.com

mbasil@willkie.com

Attorneys for Univar Solutions Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served on Counsel of Record via CM/ECF on May 5, 2021.

/s/ Maria C. Liu
